

State of New Mexico ENVIRONMENT DEPARTME

Hazardous Waste Bureau 2905 Rodeo Park Drive East, Building 1 Santa Fe, New Mexico 87505-6303 Telephone (505) 428-2500 Fax (505) 428-2567

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SECRETARY

DERRITH WATCHMAN-MOORE DEPUTY SECRETARY

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

August 27, 2004

R. Paul Detwiler, Acting Manager Carlsbad Field Office Department of Energy P.O. Box 3090 Carlsbad, New Mexico 88221-3090

Dr. Steven Warren, President Washington TRU Solutions LLC P.O. Box 2078 Carlsbad, New Mexico 88221-5608

NMED APPROVAL OF THE SAVANNAH RIVER SITE/CENTRAL CHARACTERIZATION RE: PROJECT FINAL AUDIT REPORT, AUDIT A-04-01 WASTE ISOLATION PILOT PLANT EPA I.D. NUMBER NM4890139088

Dear Mr. Detwiler and Dr. Warren:

On December 1, 2003, the New Mexico Environment Department (NMED) received the Final Audit Report of the Savannah River Site/Central Characterization Project (SRS/CCP) Audit Number A-04-01 (Audit Report), from the Department of Energy's Carlsbad Field Office (CBFO). CBFO and Washington TRU Solutions LLC (the Permittees) were required to submit this Audit Report under the Waste Isolation Pilot Plant (WIPP) Hazardous Waste Facility Permit as specified in Permit Condition II.C.2.c. The intended scope of this annual recertification audit was to ensure the continued adequacy, implementation, and effectiveness of the SRS/CCP waste characterization processes for retrievably stored debris contact-handled waste relative to the requirements of the WIPP Permit. The initial Audit Report consisted of the following items:

- A narrative report
- Completed copies of relevant Permit Attachment B6 checklists
- Final SRS/CCP standard operating procedures (hardcopy only)
- Corrective action reports and items corrected during the audit
- Objective evidence examined during the audit
 - General information
 - Acceptable knowledge

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- Headspace gas
- Real time radiography
- Visual examination

On July 6, 2004, NMED provided the Permittees with comments on the initial Audit Report, noting that it was incomplete due to the exclusion of certain elements that had originally been within the scope of the audit. On July 21, 2004, NMED received the Permittees' response to comments in a transmittal dated July 20, 2004, which included a revised Final Audit Report, revised B6 checklists, and additional standard operating procedures.

NMED concludes that this revised Audit Report demonstrates that SRS/CCP has adequately implemented the applicable characterization requirements of the WAP. Therefore, NMED approves the Permittees' Final Audit Report for SRS/CCP Audit A-04-01 for the recertification of retrievably stored debris contact-handled waste, and amends the previous Audit Report approval for Audit A-03-01 issued by NMED on April 9, 2003 to include all waste forms and processes evaluated by this recertification audit.

If you have any questions regarding this matter, please contact Steve Zappe at (505) 428-2517.

Sincerely,

James P. Bearzi

Chief

Hazardous Waste Bureau

JPB:soz

cc: Charles Lundstrom, NMED WWMD

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